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Attorney for Defendant  
APPLE INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RAJA KANNAN,  
  
Plaintiff,  
  
v.  
  
APPLE INC.,  
  
Defendant.

Case No. 5:17-cv-07305-EJD (VKD)

**DEFENDANT APPLE INC.'S  
STATEMENT RE COMPLIANCE PER  
DKT. 262**

Complaint Filed: December 26, 2017  
FAC Filed: May 10, 2018  
SAC Filed: October 19, 2018

Pursuant to the Order of Magistrate Judge Virginia DeMarchi (Dkt. 262), Defendant APPLE INC. (“Apple” or “Defendant”), by and through its respective counsel of record, hereby respectfully submits its statement of compliance as follows:

**1. Documents Containing Confidential Employee-Specific Information**

Apple respectfully requests until June 10 to produce the summary for the eight Apple employees who reported to Mr. Kotni during the period of time from January 1, 2011 through December 31, 2018 as the data took some time to compile and is currently being verified internally with Apple’s compensation team. If the data is verified sooner, Apple will produce it to Plaintiff upon verification. The deadline to file dispositive motions is July 2, 2020, thus, this slight delay should not impact Plaintiff’s ability to file an opposition to Apple’s dispositive motions.

**2. Expert Reports**

Apple has reviewed the two expert reports that were produced and designated as Attorneys’ Eyes Only in this matter. Apple previously produced a “Confidential” version of these two expert reports with certain portions relating to other employees redacted as Attorney’s Eyes Only in January 2020. Upon further review, Apple has made additional revisions to the “Confidential” versions of the two expert reports by removing certain redactions so that Plaintiff is provided with as much information as possible, while protecting the confidential compensation information of other employees. Apple served these revised redacted reports on June 3, 2020. Additionally, given the fact that Plaintiff’s expert has withdrawn from this matter as confirmed by Plaintiff (see e.g., Dkt. Nos. 258, 264), Apple understands that absent a Court order to the contrary, expert discovery is closed and Plaintiff will not be submitting expert testimony.

Dated: June 3, 2020

BAKER & McKENZIE LLP

By: /s/ Todd K. Boyer

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APPLE INC.